

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	CHAPTER 11
FIELDWOOD ENERGY III LLC, <i>et al.</i> ,	§	
	§	CASE NO. 20-33948 (MI)
Post-Effective Date Debtors. ¹	§	
	§	(Jointly Administered)

**STIPULATION REGARDING RESPONSE DEADLINE TO
RYAN, LLC FEE APPLICATION**

This *Stipulation Regarding Response Deadline to Ryan, LLC Fee Application* (the “Stipulation”) is entered into by and between David M. Dunn, Plan Administrator (the “Plan Administrator”) in the above-captioned case, and Ryan, LLC (“Ryan” and, together with the Plan Administrator, the “Parties”), by and through their respective counsel, with reference to the following facts:

WHEREAS, on October 12, 2021, Ryan filed its *Final Fee Application of Ryan, LLC for Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred*

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor’s federal tax identification numbers, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the “Post-Effective Date FWE I Subsidiaries”) are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

Postpetition [Dkt. 2091] (the “Fee Application”);

WHEREAS, on October 26, 2021, the Parties, together with certain other professionals retained by the Debtors in the Bankruptcy Cases, entered into a stipulation (the “October 26 Stipulation”) [Dkt. 2103], pursuant to which, among other things, the Parties stipulated that the deadline to respond to the Fee Application is twenty-one (21) days from the date upon which Ryan served the Fee Application;

WHEREAS, on October 27, 2021, the Court signed the October 26 Stipulation, setting the deadline for any party-in-interest, including the Plan Administrator, to file and serve any response to the Fee Application at twenty-one (21) days from the date upon which the Fee Application was served (the “Response Deadline”);

WHEREAS, the Parties have entered into discussions to resolve certain issues in the Fee Application, as identified by the Plan Administrator;

WHEREAS, the Parties have agreed, subject to approval of this Court, to stipulate to an additional fourteen (14) day extension of the Response Deadline solely as to the Plan Administrator;

NOW, THEREFORE, IT IS STIPULATED AND AGREED TO BY THE PARTIES, AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:

1. The above recitals are incorporated by reference herein with the same force and effect as if fully set forth hereinafter.

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2. The Response Deadline is extended through and including November 16, 2021, solely as to the Plan Administrator.

Dated:

Honorable Marvin Isgur
United States Bankruptcy Judge

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

Dated: November 2, 2021

MINTZ LEVIN COHN FERRIS GLOVSKY AND
POPEO, P.C.

/s/ Joseph R. Dunn

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Dated: November 2, 2021

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